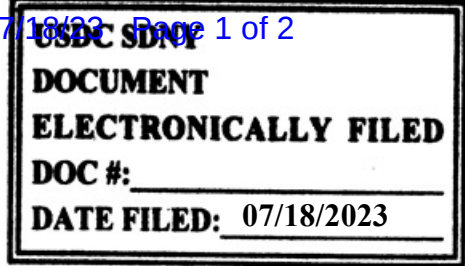


MEMO ENDORSED

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July 17, 2023

VIA ECF

Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED: The Pre-settlement telephone conference scheduled on Tuesday, July 18, 2023, at 12:15 p.m. is hereby rescheduled to Tuesday, August 22, 2023 at 4:30 p.m. Please dial (866) 434-5269, Access code: 4858267.

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

Re: Rahim v. City of New York, et al.
22-cv-09760 (JMF)(KHP)

07/18/2023

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants Honorable Louis A. Molina, Warden Charisma Carter, Captain Afiya Mitchell, and Deputy Warden Richard Polite ("City Defendants"). City Defendants write to respectfully request a thirty (30) day adjournment of the telephone conference scheduled for tomorrow, July 18, 2023. This is City Defendants' first request for an adjournment of the conference. Plaintiff's counsel consents to this request. City Defendants sincerely apologize for the lateness of this request.

As the Court is aware, plaintiff's complaint is based on two separate incidents allegedly occurring on August 19, 2021 and March 1, 2022. Regarding the alleged August 19, 2021 incident, defendants have produced paper documents concerning the incident but, due to technical issues, have been unable to provide plaintiff with a working copy of the video of the incident. City Defendants hope to rectify the issue this week. Regarding the alleged March 1, 2022 incident, defendants are still trying to locate documents pertaining to any such incident. As such, City Defendants are not in a position to fully assess the settlement value of this case and/or to meaningfully engage in settlement discussions with the Court.

Accordingly, City Defendants respectfully request a thirty day adjournment of the pre-settlement telephone conference scheduled for tomorrow, July 18, 2023. Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ James M. Sheehan

James M. Sheehan

Assistant Corporation Counsel

Special Federal Litigation Division

VIA ECF

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